

EXHIBIT A

IN THE SUPERIOR COURT FOR THE STATE OF ALASKA
FOURTH JUDICIAL DISTRICT AT FAIRBANKS

DANA HOOVER,

Plaintiff,

v.

LOWE'S COMPANIES, INC.,
d/b/a Lowe's Home Centers, LLC,

Defendant.

FILED in the Trial Court
State of Alaska Fourth District

APR 30 2019

By _____ Deputy

Case No. 4FA-19-C1883 CI

COMPLAINT

Plaintiff Dana Hoover, by and through her undersigned counsel and for her complaint against the defendant, Lowe's Companies, Inc., d/b/a Lowe's Home Centers, LLC, (hereinafter referred to as Lowe's) hereby alleges as follows:

1. At all times relevant plaintiff Dana Hoover was a resident of the State of Alaska, Fourth Judicial District, at Fairbanks, Alaska.
2. At all times relevant defendant Lowe's, was an entity doing business in the State of Alaska, Fourth Judicial District, at Fairbanks, Alaska.
3. At all times relevant plaintiff Ms. Hoover was a patron of defendant Lowe's store located at 425 Merhar Ave, Fairbanks, Alaska.
4. The defendant Lowe's had a duty to maintain its premises in a reasonable safe condition.
5. On or about April 30, 2017, the main entrance to defendant Lowe's store was not maintained in a reasonable safe condition. There was liquid that accumulated near the entrance door, next to defendant's customer service desk, with no adequate warning of its presence.

STEPOVICH
LAW OFFICE

543 Second Avenue
Suite A
Fairbanks, Alaska
99701
Tel: (907) 452-6600
Fax: (907) 452-5205

6. On or about April 30, 2017, while the plaintiff Hoover was a customer at Lowe's Fairbanks store, she was going from the west side of the store to the east utilizing the aisle nearest the store's front entrance. As she proceeded by the customer service desk she slipped, landing on the floor fracturing her left ankle.

7. As a direct and proximate consequence of defendant Lowe's failure to maintain their store in a safe condition, it was foreseeable that plaintiff Ms. Hoover would slip, fall, and be injured.

8. As a proximate consequence of her fall at defendant Lowe's premises, as described herein, plaintiff Hoover sustained physical injuries resulting in compensatory losses including, but not limited to, past and future medical expenses, past and future loss of earnings, loss of earning capacity, pain and suffering, and loss of enjoyment of life.

WHEREFORE, plaintiff Dana Hoover requests the following relief in an amount not less than the jurisdictional level of the superior court for:


- A. Past and future medical expenses;
- B. Past and future loss of income and ability to earn money;
- C. Past and future pain, suffering, and inconvenience;
- D. Past and future loss of enjoyment of life;
- E. Attorney's fees, costs, and prejudgment interest from the date of the accident, as well as such other relief as the court may deem just and proper under the circumstances.

**STEOVICH
LAW OFFICE**

543 Second Avenue
Suite A
Fairbanks, Alaska
99701
Tel: (907) 452-6600
Fax: (907) 452-5205

DATED at Fairbanks, Alaska this 29th day of April, 2019.

STEPOVICH LAW OFFICE


SANDRA K. ROLFE
ABA# 1305009

STEPOVICH
LAW OFFICE

543 Second Avenue
Suite A
Fairbanks, Alaska
99701
Tel: (907) 452-6600
Fax: (907) 452-5205

IN THE SUPERIOR COURT FOR THE STATE OF ALASKA
FOURTH JUDICIAL DISTRICT AT FAIRBANKS

DANA HOOVER,

Plaintiff,

v.

LOWE'S COMPANIES, INC.,
d/b/a Lowe's Home Centers, LLC,

Defendant.

FILED in the Superior Court
State of Alaska Fourth Judicial District

APR 30 2019

By _____ Deputy

Case No. 4FA-19-01883 CI

REQUEST FOR JURY TRIAL

Defendant Dana Hoover, by and through her undersigned attorney and pursuant to Alaska Rule of Civil Procedure 38(b), hereby requests and demands a trial by jury on all issues triable of right by a jury in the above-captioned matter.

DATED at Fairbanks, Alaska, this 29th day of April, 2019.

STEPOVICH LAW OFFICE


SANDRA K. ROLFE
ABA #1305009

STEPOVICH
LAW OFFICE

543 Second Avenue
Suite A
Fairbanks, Alaska
99701
Tel: (907) 452-6600
Fax: (907) 452-5205

Hoover, Request for Jury Trial

IN THE SUPERIOR COURT FOR THE STATE OF ALASKA
FOURTH JUDICIAL DISTRICT AT FAIRBANKS

DANA HOOVER,

Plaintiff,

v.

LOWE'S COMPANIES, INC.,
d/b/a Lowe's Home Centers, LLC,

Defendant.

FILED in the Trial Courts
State of Alaska Fourth District

APR 30 2019

By _____ Deputy

Case No. 4FA-19-01883 CI

ENTRY OF APPEARANCE

STEPOVICH LAW OFFICE hereby enters its appearance on behalf of the Plaintiff Dana Hoover, and requests that all discovery, pleadings, correspondence, and motions be served upon it at 543 Second Avenue, Suite A, Fairbanks, Alaska, 99701.

DATED at Fairbanks, Alaska this 29th day of April, 2019.

STEPOVICH LAW OFFICE


SANDRA K. ROLFE
ABA# 1305009

STEPOVICH
LAW OFFICE

543 Second Avenue
Suite A
Fairbanks, Alaska
99701
Tel: (907) 452-6600
Fax: (907) 452-5205

IN THE SUPERIOR COURT FOR THE STATE OF ALASKA
FOURTH JUDICIAL DISTRICT AT FAIRBANKS

DANA HOOVER,

Plaintiff,

v.

LOWE'S COMPANIES, INC.,
d/b/a Lowe's Home Centers, LLC,

Defendant.

Case No. 4FA-19-01887 CI

To Defendant: Lowe's Companies Inc., d/b/a Lowe's Home Centers, LLC

Agent: Corporation Service Company

You are hereby summoned and required to file with the court an answer to the complaint which accompanies this summons. Your answer must be filed with the court whose address is 101 Lacey Street, Fairbanks, Alaska 99701, within 20 days* after the day you receive this summons. In addition, a copy of your answer must be sent to the plaintiff's attorney, Stepovich Law Office, at 543 Second Avenue, Suite A, Fairbanks, Alaska 99701.

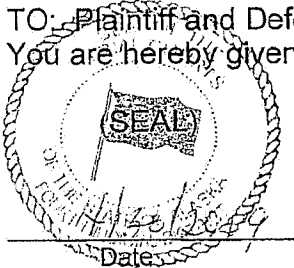
If you fail to file your answer within the required time, a default judgment may be entered against you for the relief demanded in the complaint.

A judicial assignment had been made in this case. Consult Alaska Rule of Civil Procedure 42 for time limits and for other information about seeking a change of judge.

NOTICE OF JUDICIAL ASSIGNMENT

TO: Plaintiff and Defendant

You are hereby given notice that this case has been assigned to Judge MacDonald.



CLERK OF THE COURT

By: [Signature]

Deputy Clerk

**STEOVICH
LAW OFFICE**

543 Second Avenue
Suite A
Fairbanks, Alaska
99701
Tel: (907) 452-6600
Fax: (907) 452-5205

* The state or a state officer or agency named as defendant has 40 days to file its answer. If you have been served with this summons outside the United States, you also have 40 days to file your answer.
CIV-100 ANCH (10/05) (st.3) Civil Rules 4,5,12, 42(c), 55
SUMMONS

CASE DESCRIPTION – SUPERIOR COURT

Case Number: 4FA-19-1883C1

Type of Action	For Court Use Only	
Check the box that best describes the case. Mark one box only. For district court cases, use form CIV-125D.	Case Type	Action Code
Domestic Relations		
Divorce With Children (or Pregnant)	Div or Cust w/Children	CISDVC
Divorce Without Children	Divorce Without Children	CISDIV
Uncontested Divorce With Children (or Pregnant)	Div or Cust w/Children	CISUDVC
Uncontested Divorce Without Children	Divorce Without Children	CISUDIV
Custody (Unmarried Parents)	Div or Cust w/Children	CISCUS
Uncontested Custody (Unmarried Parents)	Div or Cust w/Children	CISUCUS
Visitation by Person Other than Parent	Domestic Relations Other	CIVIS
Property Division – Unmarried Partners	Domestic Relations Other	CISPROP
Legal Separation With Children (or Pregnant)	Legal Separation	CICLS
Legal Separation Without Children	Legal Separation	CISLS
Annulment	Domestic Relations Other	CIANNUL
Uncontested Legal Separation with Children (or Pregnant)	Legal Separation	CIUCLS
Uncontested Legal Separation Without Children	Legal Separation	CIUSLS
Paternity - Establishment	Domestic Relations Other	CISPAT
Paternity - Disestablishment	Domestic Relations Other	CIDPAT
Genetic Testing - Failure to Comply with Order for Testing	Domestic Relations Other	CIOSCP
Administrative Child Support Order – Modification or Enforcement	Domestic Relations Other	CIPCS
PFD or Native Dividend Case	Domestic Relations Other	CIPND
Foreign Support Order - Registration, Modification or Enforcement under AS 25.25	Domestic Relations Other	CIUIFSA
Foreign Custody Order – Registration, Modification or Enforcement under AS 25.30	Domestic Relations Other	DR483
Both Foreign Custody & Support Order – Registration, Modification or Enforcement under AS 25.30 and AS 25.25	Domestic Relations Other	CIFC5
Foreign Domestic Relations Order (Not Custody or Support) – Registration, Modification or Enforcement	Domestic Relations Other	CIDRFJ
Landlord/Tenant		
Eviction (May Include Rent or Damages)	Eviction-Superior Court	CISFED
Other Landlord/Tenant (No Eviction)	Civil Superior Court	CISLT
Debt/Contract		
Debt Collection	Civil Superior Court	CISDEB
Claim by Buyer Against Seller of Goods/Services	Civil Superior Court	CISCLAIM
Employment – Discrimination	Civil Superior Court	CISEMPD
Employment – Other Than Discrimination	Civil Superior Court	CISEMP
Other Contract	Civil Superior Court	CISOCT
Real Property Actions		
Condemnation	Civil Superior Court	CISCNDM
Foreclosure	Civil Superior Court	CISFOR
Quiet Title	Civil Superior Court	CISQIT
Real Property Tax Foreclosure	Superior Court Misc Petition	CISTAX
Other Real Estate Matter	Civil Superior Court	CISREM
Foreign Judgment		
Registration of Foreign Judgment – SEE DOMESTIC RELATIONS FOR FOREIGN SUPPORT/CUSTODY ORDERS	Foreign Judgment Superior Ct	CISFOJ

CASE DESCRIPTION – SUPERIOR COURT

Case Number: _____

Type of Action	For Court Use Only	
Check the box that best describes the case. Mark one box only. For district court cases, use form CIV-125D.	Case Type	Action Code
Tort		
<input type="checkbox"/> Wrongful Death	Civil Superior Court	CISPID
<input type="checkbox"/> Automobile Tort (But Not Wrongful Death)	Civil Superior Court	CISIDA
<input checked="" type="checkbox"/> Claim Against Owner of Real Property for Personal Injury	Civil Superior Court	CISPIO
<input type="checkbox"/> Product Liability	Civil Superior Court	CISPL
<input type="checkbox"/> Intentional Tort (e.g., assault, battery, vandalism)	Civil Superior Court	CISIT
<input type="checkbox"/> Slander/Libel/Defamation	Civil Superior Court	CISSLD
<input type="checkbox"/> Other Tort	Civil Superior Court	CISIDO
<input type="checkbox"/> Approval of Minor Settlement – Civil Petition <i>May also be filed as probate case.</i>	Superior Court Misc Petition	CISPET
Malpractice		
<input type="checkbox"/> Legal Malpractice	Civil Superior Court	CISLMP
<input type="checkbox"/> Medical Malpractice	Civil Superior Court	CISMMP
<input type="checkbox"/> Other Malpractice	Civil Superior Court	CISOMP
Other Civil		
<input type="checkbox"/> Election Contest or Recount Appeal	Civil Superior Court	CISELE
<input type="checkbox"/> Change of Name - Adult	Change of Name	CICON
<input type="checkbox"/> Change of Name - Minor	Change of Name	CICONM
<input type="checkbox"/> Confession of Judgment	Civil Superior Court	CISCONF
<input type="checkbox"/> Structured Settlement – AS 09.60.200	Superior Court Misc Petition	CISSS
<input type="checkbox"/> Administrative Agency Proceeding – Request for Court Assistance	Superior Court Misc Petition	CISWRNT
<input type="checkbox"/> Arbitration - Action Under Uniform Arbitration Act	Civil Superior Court	CISAP
<input type="checkbox"/> Fraud	Civil Superior Court	CISFRAUD
<input type="checkbox"/> Unfair Trade Practice and Consumer Protection	Civil Superior Court Clerk: Issue form CIV-128	CISUTP
<input type="checkbox"/> Writ of Habeas Corpus	Civil Superior Court	CIWHC
<input type="checkbox"/> Fish & Game - Abatement & Forfeiture of Equipment	Superior Court Misc Petition	CISAF
<input type="checkbox"/> Appointment of Trustee Counsel	Superior Court Misc Petition	CISTC
<input type="checkbox"/> Action Under Alaska Securities Act	Civil Superior Court	CISASA
<input type="checkbox"/> Other Superior Court Complaint	Civil Superior Court	CISOCT
<input type="checkbox"/> Other Superior Court Petition	Superior Court Misc Petition	CISPET
Post-Conviction Relief to Superior Court		
<input type="checkbox"/> Post-Conviction Relief	Post-Conviction Relief-Sup Ct	CISPCR
Appeal to Superior Court - From Administrative Agency		
<input type="checkbox"/> Election Contest or Recount Appeal – SEE OTHER CIVIL		
<input type="checkbox"/> DMV Appeal	Appeal from Admin Agency	CIADDMV
<input type="checkbox"/> Employment Security Appeal	Appeal from Admin Agency	CIADRESA
<input type="checkbox"/> Administrative Agency Appeal - Other	Appeal from Admin Agency	CIADR
<input type="checkbox"/> CSSD License Review Action	Petition for Review or Relief	CICSED
<input type="checkbox"/> Petition for Review from Administrative Agency	Petition for Review or Relief	CIPRA
<input type="checkbox"/> Petition for Relief from Administrative Agency – AS 44.62.305	Petition for Review or Relief	CIPRLF
Appeal to Superior Court - From District Court		
<input type="checkbox"/> Civil Appeal	Appeal from District Court	CIACI2
<input type="checkbox"/> Criminal Appeal	Appeal from District Court	CIACRM
<input type="checkbox"/> Minor Offense Appeal	Appeal from District Court	CIAMO
<input type="checkbox"/> Small Claims Appeal	Appeal from District Court	CIASC
<input type="checkbox"/> Petition for Review from Civil, Criminal, or Minor Offense Case	Petition for Review or Relief	CIPRD2
<input type="checkbox"/> Petition for Review from Small Claims	Petition for Review or Relief	CIPRSC